

FB EXHIBIT B

Plaintiffs' Revised Proposed Case Schedule
June 28, 2021

Date	Event
January 31, 2022	Substantial completion of document production ¹
March 17, 2022	Final amended production of privilege logs per Dkt. 462 ²
June 17, 2022	Close of fact discovery (with exception of discovery regarding documents improperly withheld as privileged)
July 15, 2022	Disclosure of affirmative expert witnesses and service of related expert reports
September 9, 2022	Disclosure of responsive expert witnesses and service of related expert reports
October 21, 2022	Disclosure of rebuttal expert witness and service of related expert reports
November 4, 2022	Close of expert discovery
December 9, 2022	Motion for class certification
January 13, 2022	Opposition to motion for class certification
February 17, 2023	Reply in support of motion for class certification
30 days after issuance of class certification decision	Dispositive motions
30 days after filing of dispositive motions	Oppositions to dispositive motions
14 days after filing of dispositive motions	Replies in support of dispositive motions
September 2023	Trial (estimated)

Commented [LEW1]: Adopting FB's proposed dates here

Commented [LEW2]: Judge Chhabria has already decided that expert disclosures for class cert/summary judgment are to be aligned. Doing otherwise complicates and delays the schedule.

¹ The substantial completion deadline assumes that by the deadline Facebook will have substantially completed production of: all data for the Named Plaintiffs; ADI documents pursuant to Court-ordered resolution; non-custodial document production; targeted production of documents from additional custodians or sources; and documents related to business partners, as well as supplementing interrogatory responses regarding the same, by the deadline. It also assumes Facebook will have substantially completed documents from any other disputes timely raised and resolved by the deadline.

² Privilege logs will be produced pursuant to the existing protocol, Dkt. No. 462.